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October 28, 2020

**Via ECF**

Hon Vernon S. Broderick, U.S.D.J.  
United States Courthouse  
Southern District of New York  
40 Foley Square  
New York, NY 10007

APPLICATION GRANTED  
SO ORDERED   
VERNON S. BRODERICK  
U.S.D.J. 10/29/2020

Re: Ovalles Acosta v. Prudent Management et al  
Case No.: 17-cv-07590

Your Honor:

This office represents Jose A. Ovalles Acosta ("Plaintiff") in the above referenced action brought pursuant to the Fair Labor Standards Act ("FLSA") and New York Labor Law ("NYLL"). We write to request a thirty (30) day extension of time to file our request for settlement approval pursuant to *Cheeks v. Freeport Pancake House, Inc.*, 796 F.3d 199, 206 (2d Cir. 2015).

The Parties are still in the process of re-drafting the Settlement Agreement in this action and will need the time to have the Agreement signed by our clients. Given this, we believe a short extension of time to file the fairness from today, November 2, 2020 until December 2, 2020 will allow the Parties to file their request for approval. This is the third request for an extension of time to file a request for settlement approval.

Prior to making this request we contacted Defendants' counsel, but were unable to get a response prior to making the application.

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We thank the Court for its courtesy in this regard.

Respectfully Submitted,  
LAW OFFICE OF WILLIAM CAFARO

A handwritten signature in blue ink, appearing to read 'Amit Kumar', is positioned below the typed name.

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CC:  
All Defense Counsel of record (via ECF)